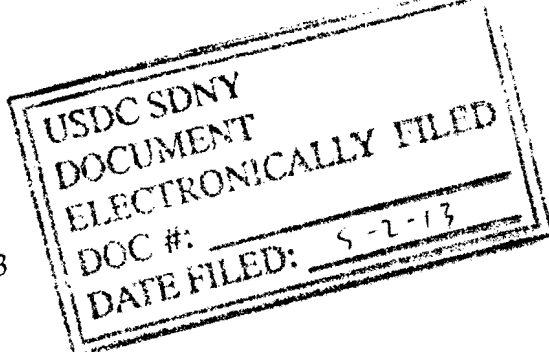


DEBEVOISE & PLIMPTON LLP

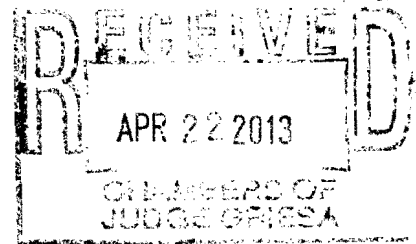
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April 22, 2013

VIA HAND DELIVERY

The Honorable Thomas P. Griesa
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



MEMO ENDORSED

Gonzalez, Evaristo, and Maldonado v. Empire Corner of 8, Inc., et al.
Case No. 12 Civ. 6167 (TPG)

To the Honorable Judge Griesa:

The parties in the above referenced matter jointly request that the Court enter an order extending deadlines found in the discovery schedule entered on January 10, 2013. We request extending the deadlines for fact discovery and for depositions from May 1, 2013 to May 31, 2013. We also request extending the deadline for dispositive motions from July 1, 2013 to July 15, 2013. No prior requests for extensions of time have been made in this matter.

The parties have made substantial progress in completing discovery, including the exchange of initial disclosures, hundreds of pages of documents, and written discovery. Additional time is needed, however, to complete discovery. The parties are currently in the process of meeting and conferring regarding shortcomings identified by Plaintiffs in Defendants' discovery responses. The parties hope to resolve each of these issues without the intervention of the court. As a result of these issues, however, the parties require additional time to complete discovery. Accordingly, the parties respectfully request that the Court extend the discovery schedule.

If authorized by the Court, the new deadlines would be as follows:

- (i) All fact discovery shall be completed by May 31, 2013.
- (ii) Depositions shall be completed by May 31, 2013.

Approved: Thomas P. Griesa
5/2/13

Hon. Thomas P. Griesa

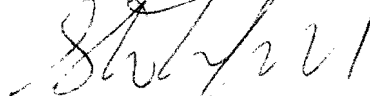
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April 22, 2013

(iii) Dispositive motions shall be filed by July 15, 2013.

Pursuant to Paragraph 1(E) of this Court's individual practices, a proposed order is enclosed. The parties would, of course, be happy to discuss this request with you either by telephone or in a personal conference. We appreciate your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stuart C. Naifeh', with a stylized flourish at the end.

Stuart C. Naifeh

cc: Stephen B. Irwin, Esq.

Enclosure